

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL WISNEFSKI,

Plaintiff,

v.

MICKEY GROUP INC. and ALEX
RABENS,

Defendants.

Case No. 1:23-cv-04984

District Judge Ellis

Magistrate Judge Kim

**PLAINTIFF'S RESPONSE TO DEFENDANTS'
REQUESTS FOR PRODUCTION OF DOCUMENTS**

NOW COMES Plaintiff, MICHAEL WISNEFSKI, by and through its attorneys, GALARNYK & ASSOCIATES, LTD., and in response to the Requests for Production of Documents served by Defendants, MICKEY GROUP INC. and ALEX RABENS, answers as follows:

RESPONSE

Requests for Production

1. All documents identified, reviewed, or otherwise used in drafting the Complaint.

RESPONSE: *See* Documents Bates marked WISNEFSKI 001-034.

2. All Documents and Communications on which You will rely to support or evidence

Your claims at trial in this matter.

RESPONSE: *See* Documents Bates marked WISNEFSKI 001-034. Plaintiff further reserves the right to use any documents produced by the Defendants in this action.

3. All Documents and Communications referenced or identified in Your responses to the above Interrogatories and all Documents and Communications on which Your responses to those Interrogatories are based.

RESPONSE: *See Documents Bates marked WISNEFSKI 001-034.*

4. All Documents in Your possession, custody, or control that relate to Mickey Group or Rabens.

RESPONSE: Plaintiff objects to this request to produce as overbroad and not reasonably limited in time or scope. Plaintiff further objects to this request to produce as irrelevant to the extent it seeks documents other than those produced that relate to the subject matter of this lawsuit. i.e., Plaintiff's termination and owed compensation.

5. All Documents, including Communications between You and any other Person, discussing, referring to, or relating to Your separation from employment with Mickey Group or Mickey Group's decision to terminate Your employment.

RESPONSE: *See Documents Bates marked WISNEFSKI 001-005, 010, 012-014, 020-025, 029-034.*

6. All Documents, including Communications between You and any other Person, relating to Your allegation in paragraph 13 of the Complaint that You were "fired by Mickey Group's CEO, Alex, via text message."

RESPONSE: *See Documents Bates marked WISNEFSKI 001-002, 004, 012.*

7. All Documents, including Communications between You and any other Person, relating to Your allegation in paragraph 26 of the Complaint that Your employment with Mickey Group was "terminated without cause."

RESPONSE: *See Documents Bates marked WISNEFSKI 001-034.*

8. All Documents, including Communications between You and any other Person, relating to Your allegation in paragraph 19 of the Complaint that after the end of Your employment with Mickey Group, You “repeatedly contacted Mickey Group to request [Your] final compensation.”

RESPONSE: *See Documents Bates marked WISNEFSKI 001-005, 010, 012-014, 020-025.*

9. All Documents, including Communications between You and any other Person, relating to Your allegation in paragraph 36 of the Complaint that “You tried communicating with Alex [Rabens] multiple times via email and text message regarding [Your] employment status and unpaid compensation.”

10. **RESPONSE:** *See Documents Bates marked WISNEFSKI 001-005, 010, 012-014, 020-025, 029-034.*

11. All Documents, including Communications between You and any other Person, relating to Your allegation in paragraph 37 of the Complaint that Defendant Rabens “knowingly permitted Mickey Group to violate the Wage and Payment Act.”

RESPONSE: *See Documents Bates marked WISNEFSKI 001-010, 012-014, 020-025, 029-034.*

12. All Documents, including Communications between You and any other Person, relating to Your allegation in paragraph 28 of the Complaint that Mickey Group “failed and refused to pay [Your] final compensation.”

RESPONSE: *See Documents Bates marked WISNEFSKI 001-010, 012-014, 020-025, 029-034.*

13. All Documents, including Communications between You and any other Person, relating to Your allegation in paragraph 44 of the Complaint that Mickey Group “breached the terms of the Agreement.”

RESPONSE: *See Documents Bates marked WISNEFSKI 001-034.*

14. All Documents, including Communications between You and any other Person, relating to Your allegations in paragraphs 29, 40, and/or 45 of the Complaint that You “ha[ve] been damaged” as a result any alleged violation by Mickey Group and/or Rabens of the Illinois Wage Payment and Collection Act and/or any alleged breach of the Agreement by Mickey Group.

RESPONSE: *See Documents Bates marked WISNEFSKI 001-034.*

15. All documents You relied upon to calculate the “Quarterly Bonus Payment for the first quarter of 2023” You contend You earned during Your employment with Mickey Group and that Mickey Group allegedly has not paid Plaintiff.

RESPONSE: *See Documents Bates marked WISNEFSKI 015-019.* Plaintiff further reserves the right to rely upon any documents produced by the Defendants in this action.

16. All Documents on which You rely to evidence the amount of damages and monetary relief You are claiming in this litigation.

RESPONSE: *See Documents Bates marked WISNEFSKI 001-034.* Plaintiff further reserves the right to rely upon any documents produced by the Defendants in this action.

17. All Documents referring or relating to Your efforts to secure employment on or after January 1, 2022.

RESPONSE: Plaintiff objects to this request as irrelevant to his claims for contractually agreed severance and earned commissions.

18. All Documents relating to income earned by You since January 1, 2018, including but not limited to Your 2018 through 2022 state and federal tax returns, with all schedules and supporting documents, and all documents concerning employment and pay records, all related tax returns, employer tax forms, employee W-2s, and 1099s for 2018 through 2023.

RESPONSE: Plaintiff objects to this request as overbroad, not reasonably limited in time and scope, and irrelevant to his claims for contractually agreed severance and earned commissions.

19. All documents regarding any lawsuit (other than this lawsuit), administrative charge or complaint, or other proceedings Plaintiff has been involved in as complainant, plaintiff, or defendant since January 1, 2014.

RESPONSE: *See Documents Bates marked WISNEFSKI 010.*

Respectfully Submitted,
Plaintiff, Michael Wisnesfki

By: /s/ Andrew J. Cunniff, Esq.
One of His Attorneys

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